

IN THE COUNTY COURT OF HINDS COUNTY, MISSISSIPPI
FIRST JUDICIAL DISTRICT

KIMBERLY HOBSON

PLAINTIFF

VS.

CIVIL ACTION NO. 21-3816

MOBILE MEDIC AMBULANCE SERVICE, INC.
JOHN DOES 1-5

DEFENDANT

COMPLAINT WITH DISCOVERY ATTACHED

COMES NOW, the Plaintiff, Kimberly Hobson, by and through their attorney, and files this Complaint against the Defendant, Mobile Medic Ambulance Service, Inc. and John Does 1-5, and in support of this suit, Plaintiff would show the following facts:

PARTIES

1.

Plaintiff, Kimberly Hobson, is an adult resident citizen of Rankin County, Mississippi, whose address is 119 Knight Rd. Pearl, MS 39208.

2.

Defendant, Mobile Medic Ambulance Service, Inc., is a Delaware Corporation doing business in Mississippi. Mobile Medic Ambulance Service, Inc. has a principal place of business at 6363 S. Fiddler's Green Circle, Suite 1400, Greenwood Village, CO 80111. Mobile Medic Ambulance Service, Inc., may be served with process upon its registered agent, Corporation Service Company, located at 7716 Old Canton Road, Suite C, Madison, MS 39110.



3.

John Does 1-5 are entities and/or individuals, including but not limited to, employees, agents, owners and operators of Mobile Medic Ambulance Service, Inc. who are liable to Plaintiff and who maintained authority and discretion regarding the maintenance of, control of the vehicle involved in the subject accident. This also includes the unknown driver of the said vehicle involved in the subject accident.

JURISDICTION AND VENUE

4.

This civil action arises out of the negligent acts and omissions of Defendant committed in the State of Mississippi against residents of the State of Mississippi.

5.

This Court has in personam jurisdiction over Defendant pursuant to §13-3-57 of the Mississippi Code.

6.

Venue is proper in Hinds County, Mississippi in that the accident occurred in Hinds County, Mississippi, pursuant to §11-11-3 of the Mississippi Code.

FACTS

7.

On or about December 17, 2020, in Hinds County, Mississippi, the Plaintiff was traveling westbound on or near the Pearl River Bridge. At the same time, the Defendant, John Doe, while driving the vehicle of Mobile Medic Ambulance Service, Inc., traveling in the same direct as the Plaintiff on or near the Pearl River Bridge

when he crashed into the vehicle of the Plaintiff causing damages.

8.

While responsible for the management and control of the ambulance, the Mobile Medic Ambulance Service, Inc. driver caused his or her vehicle to be driven in a careless, negligent, and reckless manner and without due regard for the safety and convenience of Kimberly Hobson. Mobile Medic Ambulance Service, Inc.'s driver did not properly control their vehicle and crashed into Plaintiffs' vehicle, which caused Kimberly Hobson great physical pain and mental anguish.

9.

At all times relevant, the Plaintiff did not contribute to the collision in any manner.

**NEGLIGENCE AND GROSS
NEGLIGENCE OF MOBILE
MEDIC AMBULANCE SERVICE, INC.**

10.

Defendant Mobile Medic Ambulance Service, Inc., before and at the time of the collision here was guilty of intentional, willful, unlawful, reckless, and/or negligent acts and/or omissions which include but are not necessarily limited to the following:

- a. Hiring and retaining John Doe;
- b. Failing to properly train John Doe;
- c. Failing to develop, implement, and/or enforce reasonable and prudent

- safety policies for the protection and safety of the public;
- d. Failing to perform an adequate pre-employment background check before hiring John Doe.

NEGLIGENCE OF JOHN DOES 1-5

11.

Plaintiff adopts by reference the foregoing paragraphs as if fully set forth herein.

12.

John Does 1-5 are entities and/or individuals, including but not limited to, employees, agents, contractors, owners, drivers, and operators of the vehicle of Mobile Medic Ambulance Service, Inc., and/or any connected parties/entities related to Mobile Medic Ambulance Service, Inc., or any other unknown parties who are liable to Plaintiff. The John Does 1-5 will be named when and if they are located and found to be a party to this cause.

13.

Disregarding his duty as a motorist, Defendant was guilty of one or more of the following:

- a. Failure to operate said vehicle with due care and caution for the safety of Plaintiff;
- b. Failure to properly control his vehicle;
- c. Failure to keep a proper look-out and be on the alert;
- d. Failure to drive at a reasonable speed;

- e. And other negligent acts or omissions of the Defendant.

14.

Each of the Defendants are liable unto your Plaintiff for the wrongs complained of herein.

DAMAGES

15.

Plaintiff is entitled to recover damages in an amount to be assessed by the jury, including but not limited to the following:

- a. Past, present and future medical expenses;
- b. Past, present and future physical pain and suffering;
- c. Past, present and future mental and emotional distress;
- d. Past, present, and future wage loss;
- d. Any other relief which the Court or jury deems just or appropriate based upon the circumstances.

16.

By reason of the outrageous, willful and wanton conduct of the Defendant as alleged herein, Plaintiff is entitled to recover punitive damages in an amount sufficient to punish and deter the Defendant and others similarly situated from committing the same wrongful acts. Plaintiff is thus requesting punitive damages as to all counts herein above.

RELIEF DEMANDED

WHEREFORE, PREMISES CONSIDERED, Plaintiff demands a judgment of and from Defendant as follows:

- (a) Actual and compensatory damages;
- (b) Pre-judgment and post-judgment interest, and all costs accrued in this action; and
- (c) Any other relief which the Court or jury deems just and appropriate.

RESPECTFULLY SUBMITTED,

KIMBERLY HOBSON

BY:



TAUREAN BUCHANAN

OF COUNSEL:

**TAUREAN BUCHANAN, MSB#102712
BUCHANAN LAW, PLLC
P. O. BOX 12274
JACKSON, MS 39236
(601) 918-4345 (PHONE)
(855)918-4345 (FAX)
TBUCHANAN@BUCHANAN.LAW**

Case: 25CO1-21 cv 00016 LCS Document # 2-1 Filed: 11/19/2021 Page 1 of 1

COVER SHEET
Civil Case Filing Form
 (To be completed by Attorney/Party
 Prior to Filing of Pleading)

Mississippi Supreme Court
 Administrative Office of Courts

Form AOC/01
 (Rev 2020)

County # 315 Judicial 7 Court ID 00
 District (CH, CI, CO) 1111527
 Month 11 Date 15 Year 27

Case Year 2021 Docket Number 3816
 Local Docket ID 00

This area to be completed by clerk

Case Number If filed prior to 1/1/94

In the COUNTY HINDS Court of HINDS County FIRST Judicial District

Origin of Suit (Place an "X" in one box only)

☐ Initial Filing ☐ Reinstated ☐ Foreign Judgment Enrolled ☐ Transfer from Other court ☐ Other
☐ Remanded ☐ Reopened ☐ Joining Suit/Action ☐ Appeal

Plaintiff - Party(ies) Initially Bringing Suit Should Be Entered First - Enter Additional Plaintiffs on Separate Form

Individual Hobson Kimberly
 Last Name First Name Maiden Name, if applicable M.I. Jr/Sr/III/IV

Check (x) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:
 Estate of
 Check (x) if Individual Plaintiff is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity:
 D/B/A or Agency

Business
 Enter legal name of business, corporation, partnership, agency - If Corporation, indicate the state where incorporated
 Check (x) if Business Plaintiff is filing suit in the name of an entity other than the above, and enter below:
 D/B/A

Address of Plaintiff 119 Knight Road, Pearl, MS 39208

Attorney (Name & Address) Taurean Buchanan, PO Box 12274, Jackson, MS 39236 MS Bar No. 102712
 Check (x) if Individual Filing Initial Pleadings NOT an attorney
 Signature of Individual Filing:

Defendant - Name of Defendant - Enter Additional Defendants on Separate Form

Individual
 Last Name First Name Maiden Name, if applicable M.I. Jr/Sr/III/IV

Check (x) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:
 Estate of
 Check (x) if Individual Defendant is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity:
 D/B/A or Agency

Business Mobile Medic Ambulance Service, Inc.
 Enter legal name of business, corporation, partnership, agency - If Corporation, indicate the state where incorporated
 Check (x) if Business Defendant is acting in the name of an entity other than the above, and enter below:
 D/B/A

Attorney (Name & Address) - If Known MS Bar No.

Check (x) if child support is contemplated as an issue in this suit.*
 *If checked, please submit completed Child Support Information Sheet with this Cover Sheet

Nature of Suit (Place an "X" in one box only)

☒ Domestic Relations ☐ Business/Commercial ☐ Children/Minors - Non-Domestic ☐ Real Property

☐ Child Custody/Visitation ☐ Accounting (Business) ☐ Adoption - Contested ☐ Adverse Possession
☐ Child Support ☐ Business Dissolution ☐ Adoption - Uncontested ☐ Ejectment
☐ Contempt ☐ Debt Collection ☐ Consent to Abortion ☐ Eminent Domain
☐ Divorce: Fault ☐ Employment ☐ Minor Removal of Minority ☐ Eviction
☐ Divorce: Irreconcilable Diff. ☐ Foreign Judgment ☐ Other ☐ Judicial Foreclosure
☐ Domestic Abuse ☐ Garnishment ☐ Other ☐ Lien Assertion
☐ Emancipation ☐ Replevin ☐ Other ☐ Partition
☐ Modification ☐ Other ☐ Tax Sale: Confirm/Cancel
☐ Paternity ☐ Other ☐ Title Boundary or Easement
☐ Property Division ☐ Other ☐ Other ☐ Torts

☐ Separate Maintenance ☐ Probate ☐ Contract ☐ Negligence - General
☐ Term. of Parental Rights-Chancery ☐ Accounting (Probate) ☐ Breach of Contract ☐ Negligence - Motor Vehicle
☐ UIFSA (eff 7/1/97; formerly URESA) ☐ Birth Certificate Correction ☐ Installment Contract ☐ Premises Liability
☐ Other ☐ Mental Health Commitment ☐ Insurance ☐ Product Liability
☐ Administrative Agency ☐ Conservatorship ☐ Specific Performance ☐ Subrogation
☐ County Court ☐ Guardianship ☐ Other ☐ Wrongful Death
☐ Hardship Petition (Driver License) ☐ Joint Conservatorship & Guardianship ☐ Statutes/Rules ☐ Other
☐ Justice Court ☐ Heirship ☐ Bond Validation ☐ Other
☐ MS Dept Employment Security ☐ Intestate Estate ☐ Civil Forfeiture ☐ Other
☐ Municipal Court ☐ Minor's Settlement ☐ Declaratory Judgment ☐ Other
☐ Other ☐ Name Change ☐ Injunction or Restraining Order ☐ Other
☐ Will Contest ☐ Other ☐ Other
☐ Alcohol/Drug Commitment (voluntary)

Case: 25CO1:21-cv-03816-LCS Document #: 3 Filed: 11/19/2021 Page 1 of 1

IN THE COUNTY COURT OF HINDS COUNTY, MISSISSIPPI
FIRST JUDICIAL DISTRICT

KIMBERLY HOBSON

PLAINTIFF

VS.

CIVIL ACTION NO. 21-3876

MOBILE MEDIC AMBULANCE SERVICE, INC.
JOHN DOES 1-5

DEFENDANT

SUMMONS

TO ANY SHERIFF OR OTHER PERSON AUTHORIZED TO SERVE PROCESS:

You are hereby commanded to Summons:

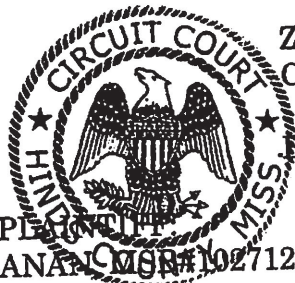
Mobile Medic Ambulance Service, Inc.
c/o Corporation Service Company
7716 Old Canton Road, Suite C
Madison, MS 39110

NOTICE TO DEFENDANT

THE COMPLAINT, PLAINTIFF'S FIRST SET OF INTERROGATORIES, REQUEST FOR PRODUCTION OF DOCUMENTS, AND REQUEST FOR ADMISSIONS, WHICH ARE ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS BY FILING YOUR ANSWER AS PROVIDED BY LAW AND/OR THE MISSISSIPPI RULES OF CIVIL PROCEDURE.

THIS ANSWER MUST BE FILED AS PROVIDED BY LAW AND/OR THE MISSISSIPPI RULES OF CIVIL PROCEDURE WITHIN THIRTY (30) DAYS OF THE DATE YOU ARE SERVED OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.

This the 19th day of NOV 2021.



ZACK WALLACE, CLERK
COUNTY COURT OF HINDS COUNTY

BY: [Signature] D. C.

COUNSELS FOR PLAINTIFF
TAUREAN BUCHANAN, MSB#102712
BUCHANAN LAW, PLLC
P.O. BOX 12274
JACKSON, MS 39236
(601)918-4345

Case: 25CO1:21-cv-03816-1 CS Document #: 4 Filed: 01/10/2022 Page 1 of 2

PROOF OF SERVICE-SUMMONS

(Process Server)

Name of Person or Entity Served:

Mobile Medic Ambulance Service, Inc.
CO CORPORATION SERVICE COMPANY

I, the undersigned process server, served the summons and complaint upon the person or entity named above in the manner set forth below (process server must check proper space and provide all additional information that is requested and pertinent to the mode of service used):

 FIRST CLASS MAIL AND ACKNOWLEDGEMENT SERVICE. By mailing (by first class mail, postage prepaid), on the date stated in the attached Notice, copies to the person served, together with copies of the form of notice and acknowledgement and return envelope, postage prepaid, addressed to the sender (Attach completed acknowledgement of receipt pursuant to M.R.C.P. Form 1B).

✓ PERSONAL SERVICE. I personally delivered copies to MOBILE MEDIC AMBULANCE CO. INC. on the 6th day of January, 2022, where I found said person(s) in FRANKLIN County of the State of MS.

 RESIDENCE SERVICE. After exercising reasonable diligence I was unable to deliver copies to said person within county, (Mississippi). I served the summons and complaint on the day of , 20 , at the usual place of abode of said person by leaving a true copy of the summons and complaint with who is the (here insert wife, husband, son, daughter or other person as the case may be), a member of the family of the person served above the age of sixteen years and willing to receive the summons and complaint, and thereafter on the day of , 20 , I mailed (by first class mail, postage prepaid) copies to the person served at his or her usual place of abode where the copies were left.

 CERTIFIED MAIL SERVICE. By mailing to an address outside Mississippi (by first class mail, postage prepaid, requiring a return receipt) copies to the person served. (Attach signed return receipt or the return envelope marked "Refused.")

At the time of service I was at least 18 years of age and not a party to this action.

Fee for service: \$

Process server must list below: [Please print or type]

Name Harri James

Address 1010 N. West St
Jackson, MS 39202

Telephone No. 769-251-0707

State of MS

County of HINDS

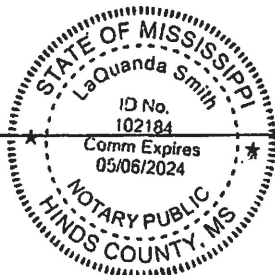
Personally appeared before me the undersigned authority in and for the state and county aforesaid, the within named who being first by me duly sworn states on oath that the matters and facts set forth in the foregoing "Proof of Service-Summons" are true and correct as therein stated.

Harri James, YBS, LLC
Process Server (Signature)

Sworn to and subscribed before me this the 10th day of January 2022

LaQuanda Smith
Notary Public

My commission expires:



Case: 25CO1:21-cv-03816-LCS Document #: 4 Filed: 01/10/2022 Page 2 of 2

Case: 25CO1:21-cv-03816-LCS Document #: 3 Filed: 11/19/2021 Page 1 of 1

IN THE COUNTY COURT OF HINDS COUNTY, MISSISSIPPI
FIRST JUDICIAL DISTRICT

KIMBERLY HOBSON

PLAINTIFF

VS.

CIVIL ACTION NO. 21-3876

MOBILE MEDIC AMBULANCE SERVICE, INC.
JOHN DOES 1-5

DEFENDANT

SUMMONS

TO ANY SHERIFF OR OTHER PERSON AUTHORIZED TO SERVE PROCESS:

You are hereby commanded to Summons:

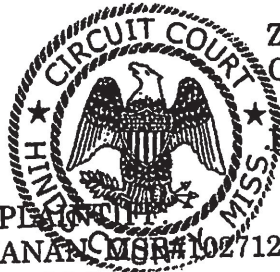
Mobile Medic Ambulance Service, Inc.
c/o Corporation Service Company
7716 Old Canton Road, Suite C
Madison, MS 39110

NOTICE TO DEFENDANT

THE COMPLAINT, PLAINTIFF'S FIRST SET OF INTERROGATORIES, REQUEST FOR PRODUCTION OF DOCUMENTS, AND REQUEST FOR ADMISSIONS, WHICH ARE ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS BY FILING YOUR ANSWER AS PROVIDED BY LAW AND/OR THE MISSISSIPPI RULES OF CIVIL PROCEDURE.

THIS ANSWER MUST BE FILED AS PROVIDED BY LAW AND/OR THE MISSISSIPPI RULES OF CIVIL PROCEDURE WITHIN THIRTY (30) DAYS OF THE DATE YOU ARE SERVED OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.

This the 19th day of NOV 2021.



ZACK WALLACE, CLERK
COUNTY COURT OF HINDS COUNTY

BY: [Signature] D. C.

COUNSELS FOR PLAINTIFF
TAUREAN BUCHANAN, MSB#102712
BUCHANAN LAW, PLLC
P.O. BOX 12274
JACKSON, MS 39236
(601)918-4345